

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

CORELLE BRANDS ACQUISITION
HOLDINGS LLC, et al.,

Debtors.

Chapter 11

Case No. 23-90716 (mi)

(Jointly Administered)

**ORACLE AMERICA, INC.'S REQUEST FOR ALLOWANCE AND PAYMENT OF
CHAPTER 11 ADMINISTRATIVE EXPENSES**

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT [HTTPS://ECF.TXSB.USCOURTS.GOV/](https://ecf.txsb.uscourts.gov/) WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

Oracle America, Inc., (“**Oracle**”), a creditor and contract counter-party in the above-captioned, jointly administered Chapter 11 cases, hereby requests allowance and payment of \$59,462.45 as an administrative expense, pursuant to sections 503(a) and (b) of the Bankruptcy Code (“**Administrative Request**”), for value provided to the estate, post-petition, by Oracle to Corelle Brands Acquisition Holdings LLC, et al. (the “**Debtors**”).

1. The Debtors filed voluntary Chapter 11 bankruptcy petitions on June 12, 2023 (“**Petition Date**”).

2. Oracle is a licensor of computer software and provides software-related products, technical support, maintenance, educational materials, and programs, as well as cloud-based and point of sale services, which Oracle often customizes for the customer’s specific needs. Prior to

the Petition Date, the Debtors and Oracle were parties to several such license agreements (“**Oracle Agreements**”).

3. On January 20, 2024, the Debtors filed their *Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization of Instant Brands Acquisition Holdings Inc. and Its Debtor Affiliates* [Dkt. No. 898] (“**Plan**”). On February 23, 2024, the Court entered an Order confirming the Plan [Dkt. No. 1146].

4. On February 20, 2024, the Debtors filed their *Notice of Filing Plan Supplement to the Debtors’ Combined Disclosure Statement and Joint Chapter 11 Plan* [Dkt. No. 1109] (“**Supplement**”). The Supplement identified those contracts rejected through the Plan. No Oracle Agreements were identified for rejection and Oracle’s contracts were not previously assumed and assigned. Therefore, pursuant to the terms of the Plan, the Debtors assumed their entire relationship with Oracle and agreed to pay a cure of \$59,462.45 (“**Cure Amount**”).

5. On February 27, 2024, the Debtors filed their *Notice of (I) Entry of Confirmation Order, (II) Occurrence of Effective Date, and (III) Administrative Claims Bar Date* [Dkt. No. 1161] (“**Notice of Effective Date**”). Oracle submits this Administrative Request pursuant to the Notice of Effective Date.

6. Oracle has not received the Cure Amount, which is represented by the outstanding invoices (“**Invoices**”) attached hereto as **Exhibit A**. Therefore, in an abundance of caution, and in order to preserve Oracle’s right to be paid, Oracle files this Administrative Request.

7. Oracle is owed the Cure Amount for services Oracle provided to the Debtors and was to be paid as a condition to assuming the Oracle Agreements.

8. Oracle asserts that it has provided tangible value to the Debtors’ estate as Debtors have used Oracle’s services throughout this Chapter 11 case.

WHEREFORE, Oracle respectfully requests allowance and payment of an administrative expense to Oracle in an amount of not less than \$59,462.45, and reserves its right to supplement this Administrative Request if additional unpaid administrative amounts accrue.

Dated: March 22, 2024

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Attorneys for Creditor, Oracle America, Inc.

Total Amount 55,840.58
Due Date 20-MAY-2023
Invoice Number 100779543

PO Number 4500048584
Invoice Date 20-APR-2023
Payment Terms Net Due in 30 Days
Contract Number 5484993
End User World Kitchen LLC

Subtotal 55,840.58
Tax 0.00

Total 55,840.58 USD

Payment Instructions

Reference Invoice Number: **100779543**

Wire Funds To

Wells Fargo Bank
 ACCT: 4522-020841
 SWIFT Code: WFBUS6S
 ABA: 121000248
 Beneficiary: Oracle America, Inc.

Mail Checks To

Oracle America, Inc.
 PO Box 203448
 Dallas, TX
 75320-3448

Credit card, PayPal,
 or eCheck Payments

Visit shop.oracle.com

Special Instructions

Bill To

Corelle Brands LLC
 AP* Account Payable
 Attn: Accounts Payable 3025 Highland Parkway, Suite 700
 DOWNERS GROVE, IL 60515
 United States

Ship To

Corelle Brands LLC
 Instant Brands Attn: Accounts Payable 3025
 Highland Parkway, Suite 700
 Downers Grove, Illinois 60515
 United States

No.	Description	Qty	Tax	Extended Amount
1	Oracle Premier Support for Systems - 2 SPARC VII+ 4-core 2.66 GHz processors (for factory installation) - Covered Product Qty: 2; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DD	2	N	10,097.78
2	Oracle Premier Support for Systems - 2 SPARC VII+ 4-core 2.66 GHz processors (for factory installation) - Covered Product Qty: 2; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DE	2	N	10,097.78
3	Oracle Premier Support for Systems - DAT option filler panel (for factory installation) - Covered Product Qty: 1; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DD	1	N	11.58
4	Oracle Premier Support for Systems - DAT option filler panel (for factory installation) - Covered Product Qty: 1; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DE	1	N	11.58
5	Oracle Premier Support for Systems - SPARC Enterprise M5000 server: base for non-EU countries (for factory installation) - Covered Product Qty: 1; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DD	1	N	11,637.65
6	Oracle Premier Support for Systems - SPARC Enterprise M5000 server: base for non-EU countries (for factory installation) - Covered Product Qty: 1; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DE	1	N	11,637.65

No.	Description	Qty	Tax	Extended Amount
7	Oracle Premier Support for Systems - Disk drive option filler panel (for factory installation) - Covered Product Qty: 2; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DD	2	N	12.36
8	Oracle Premier Support for Systems - Disk drive option filler panel (for factory installation) - Covered Product Qty: 2; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DE	2	N	12.36
9	Oracle Premier Support for Systems - CPU board option filler panel (for factory installation) - Covered Product Qty: 2; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DD	2	N	2.68
10	Oracle Premier Support for Systems - CPU board option filler panel (for factory installation) - Covered Product Qty: 2; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DE	2	N	2.68
11	Oracle Premier Support for Systems - I/O unit option filler panel (for factory installation) - Covered Product Qty: 1; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DD	1	N	29.56
12	Oracle Premier Support for Systems - I/O unit option filler panel (for factory installation) - Covered Product Qty: 1; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DE	1	N	29.56
13	Oracle Premier Support for Systems - Power cord: global jumper, straight plug-connector, 2.5 meters, IEC60320-2-2 sheet I (C20) plug, IEC60320-C19 connector, 20 A (for factory installation) - Covered Product Qty: 4; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DD	4	N	31.15
14	Oracle Premier Support for Systems - Power cord: global jumper, straight plug-connector, 2.5 meters, IEC60320-2-2 sheet I (C20) plug, IEC60320-C19 connector, 20 A (for factory installation) - Covered Product Qty: 4; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DE	4	N	31.15
15	Oracle Premier Support for Systems - One 600 GB 10000 rpm 2.5-inch SAS-2 HDD with mounting bracket (for factory installation) - Covered Product Qty: 2; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DD	2	N	330.66
16	Oracle Premier Support for Systems - One 600 GB 10000 rpm 2.5-inch SAS-2 HDD with mounting bracket (for factory installation) - Covered Product Qty: 2; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DE	2	N	330.66
17	Oracle Premier Support for Systems - Memory option filler panel (for factory installation) - Covered Product Qty: 4; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DD	4	N	4.30
18	Oracle Premier Support for Systems - Memory option filler panel (for factory installation) - Covered Product Qty: 4; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DE	4	N	4.30
19	Oracle Premier Support for Systems - Eight 4 GB DDR2-667 DIMMs for non-EU countries (for factory installation) - Covered Product Qty: 4; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DD	4	N	5,156.14

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No.	Description	Qty	Tax	Extended Amount
20	Oracle Premier Support for Systems - Eight 4 GB DDR2-667 DIMMs for non-EU countries (for factory installation) - Covered Product Qty: 4; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DE	4	N	5,156.14
21	Oracle Premier Support for Systems - Sun Quad-port Gigabit Ethernet Adapter UTP - Covered Product Qty: 3; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DD	3	N	606.43
22	Oracle Premier Support for Systems - Sun Quad-port Gigabit Ethernet Adapter UTP - Covered Product Qty: 3; 14-MAY-2023 - 13-MAY-2024; Serial# BDF12198DE	3	N	606.43

Total Amount 3,621.87
Due Date 26-MAY-2023
Invoice Number 100786668

PO Number 4500048583
Invoice Date 26-APR-2023
Payment Terms Net Due in 30 Days
Contract Number 6701172
End User World Kitchen LLC

Subtotal 3,353.58
Tax 268.29

Total 3,621.87 USD

Payment Instructions

Reference Invoice Number: **100786668**

Wire Funds To

Wells Fargo Bank
 ACCT: 4522-020841
 SWIFT Code: WFBUS6S
 ABA: 121000248
 Beneficiary: Oracle America, Inc.

Mail Checks To

Oracle America, Inc.
 PO Box 203448
 Dallas, TX
 75320-3448

Credit card, PayPal,
 or eCheck Payments

Visit shop.oracle.com

Special Instructions

Bill To

Corelle Brands LLC
 Scott Keister
 Attn: Accounts Payable 3025 Highland Parkway, Suite 700
 DOWNERS GROVE, IL 60515
 United States

Ship To

World Kitchen LLC
 Corning Facility
 Corelle Brands LLC
 One Steuben Street
 CORNING, NY 14830
 United States

No.	Description	Qty	Tax	Extended Amount
1	Oracle Premier Support for Systems - PCIe filler panel (for factory installation) - Covered Product Qty: 3; 26-MAY-2023 - 25-MAY-2024; Serial# 1520NML167	3	Y	1.39
2	Oracle Premier Support for Systems - One 16 GB DDR3-1600 DIMM (for factory installation) - Covered Product Qty: 16; 26-MAY-2023 - 25-MAY-2024; Serial# 1520NML167	16	Y	1,094.35
3	Oracle Premier Support for Systems - Four 2.5-inch drive slots and 1 DVD-RW disk cage - Covered Product Qty: 1; 26-MAY-2023 - 25-MAY-2024; Serial# 1520NML167	1	Y	115.03
4	Oracle Premier Support for Systems - Power cord: North America and Asia, 2.5 meters, 5-15P plug, C13 connector, 15 A (for factory installation) - Covered Product Qty: 2; 26-MAY-2023 - 25-MAY-2024; Serial# 1520NML167	2	Y	4.63
5	Oracle Premier Support for Systems - Sun Storage 6 Gb SAS PCIe HBA, Internal: 8 port (for factory installation) - Covered Product Qty: 1; 26-MAY-2023 - 25-MAY-2024; Serial# 1520NML167	1	Y	48.03

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No.	Description	Qty	Tax	Extended Amount
6	Oracle Premier Support for Systems - Sun Server X4-2: 1 RU base chassis with motherboard, 2 PSUs, slide rail kit, and cable management arm (for factory installation) - Covered Product Qty: 1; 26-MAY-2023 - 25-MAY-2024; Serial# 1520NML167	1	Y	593.33
7	Oracle Premier Support for Systems - One 1.2 TB 10000 rpm 2.5-inch SAS-2 HDD with marlin bracket (for factory installation) - Covered Product Qty: 4; 26-MAY-2023 - 25-MAY-2024; Serial# 1520NML167	4	Y	606.39
8	Oracle Premier Support for Systems - 1 Intel(R) Xeon(R) E5-2650 v2 8-core 2.6 GHz processor (for factory Installation) - Covered Product Qty: 2; 26-MAY-2023 - 25-MAY-2024; Serial# 1520NML167	2	Y	881.39
9	Oracle Premier Support for Systems - Heatsink (for factory installation) - Covered Product Qty: 2; 26-MAY-2023 - 25-MAY-2024; Serial# 1520NML167	2	Y	9.04